

**MEMORANDUM**

**SUBJECT:** Summary of the Phone Meeting with WDNR regarding Madison-Kipp's PCB Contamination

**FROM:** Dave Petrovski, Peter Ramanauskus, Jennifer Wilson, and Ken Zolnierczyk

**TO:** John Steketee and the File

EPA held a call at 2:30 P.M. CST with the WDNR regarding Madison-Kipp's PCB contamination in the soil and ground water beneath and near the company's facility in Madison, Wisconsin. The following people attended the call:

**WDNR**

- Steve Alice (or Allison – need to check WDNR's directory)
- Steve Elmore, Drinking Water Program Director
- Darcy Foss, RCRA Division Director
- Jess Kramer, Attorney
- Dave Marcon, ???
- Steve Martin, Manager in RCRA
- Eileen Pierce, Drinking Water
- Mike Schmoeller, RCRA Hydrogeologist

**Commented [WJ1]:** Ken, may you please check the spelling of WDNR's employee's names and their titles. I have never met Eileen Pierce so I don't know if I spelled her name correctly, but I have met Steve Elmore. I have never met the others before either.

**EPA**

- Dave Petrovski, Hydrogeologist in LCD
- Peter Ramanauskus, Scientist in LCD
- Jennifer Wilson, Engineer in WD
- Ken Zolnierczyk, Engineer in LCD

**Commented [WJ2]:** Dave, is this your title?

Mr. Zolnierczyk had everyone introduce themselves on the call. Then, he explained that he wanted to discuss some new findings regarding the PCB contamination at the Madison-Kipp facility (the Facility) in Madison, Wisconsin. He told WDNR he e-mailed them three figures. One of the figures is a cross-section of the ground beneath the facility and it contains results of

sample borings taken along the cross-section. The company's consultant, Arcadis, did not do an interpolation of data on that figure like it had on a previous figure. In addition, the figure shows a considerable difference in ground water elevation below the facility, about five feet, when it is actually about a six inch variation. He believes Arcadis was trying to display the seasonal variation on the figure, but that is distorting the results. Mr. Zolnierczyk said if you analyze the available boring data, you will notice that boring 201, which is next to boring 151, is not on the figure probably because it is not exactly on the AA cross-section. If the 201 boring result is added to the figure at the approximate location where it was taken, there is a cluster of high results in that area. Boring 200 has a value of 910 mg/kg, boring 201 has 720 mg/kg, the next data point is 1300 mg/kg, and the final one is 2900 mg/kg. After that point, there are no more borings and it is not obvious where the PCBs stop. If the correct water table is added to the figure, it shows PCBs are in the water table. Mr. Zolnierczyk said this is a big change in the information Madison-Kipp presented and he believes WDNR needs to know and consider this during settlement negotiations with Madison-Kipp.

Commented [WJ3]: Ken, please verify the units.

Mr. Zolnierczyk said that this finding has an effect on Madison's drinking water well that is about a third of the mile from the Facility. That well uses a considerable volume of water every summer. Because of the well's location, Mr. Zolnierczyk said EPA believes that pumping and treating for PCBs needs to be started. Mr. Zolnierczyk said he thinks the company claimed that it needs to pump at a higher rate to increase the zone of influence such that it includes the PCBs, but that needs to be done. Mr. Zolnierczyk added that EPA would also like Madison's drinking water sampled quarterly and ground water wells between the Facility and Madison's drinking water well sampled quarterly. He said there have been concerns in the past by Kipp about improper well construction of some of the wells and Mr. Petrovski said new wells should be drilled between the Facility and Madison's drinking water well. Mr. Zolnierczyk explained that the company needs to run unfiltered PCB analyses.

WDNR raised the low solubility of PCBs and the fact that they adhere to particular matter. The Department said the PCBs have been in a setting for colloidal media and the Department claimed it is not aware of sites where PCB ground water flow has been developed.

Mr. Petrovski said the Agency is trying to ensure the drinking water wells are not impacted. The last measured borings are pretty high and there are no results below those high numbers. The last noted reading is 3200 mg/kg and the company closed a contour below that result. Another reading is 897 mg/kg and the company closed a contour below that result as well. The distribution of the contaminants is strange, too. B198 and B191 have higher concentrations at depth than the shallower samples. It is not intuitively obvious why the results would be arranged this way. Mr. Petrovski added that EPA is interested in the location of the highest measured water table and if the PCBs penetrate below the highest measured water table because that is a worst case transport scenario.

Ms. Foss said she appreciates the heads up, but the WDNR needs time to digest this information. She said the Department had not heard from EPA in a while and she thought that there was a conclusion that the wells at the site had problems. She would like to discuss this further with EPA before EPA does something on its own as she wants to make sure the action is consistent

with the MOA. She said she will be in EPA's office next week and she would like to meet with EPA then. She wants to make sure the State and the EPA have a common understanding.

Mr. Zolnierczyk said he would like the joint settlement discussions to continue.

The WDNR claimed that Kipp chose to break the settlement negotiations with EPA.

Ms. Kramer said Madison-Kipp is moving forward with the State.

Ms. Foss asked if EPA got Kipp to agree to a coordinated review.

Mr. Zolnierczyk reiterated that EPA was told it would not be part of the ongoing negotiations.

Ms. Foss said she will be in the office next Wednesday and would like to meet with the EPA then. She said she is hoping the Department and the Agency can come to an agreement on how to proceed. She said the EPA needs to ask the company if it wants to go through coordinated review.

Mr. Zolnierczyk, Mr. Ramanauskas, and Mr. Petrovski agreed to meet with Ms. Foss on Wednesday at 3:00 P.M. Others will call in from WDNR and Ms. Wilson might call in from the conference she will be at next week if she is available that that time.

Mr. Elmore said he believes this is a remediation issue and he will not be on the next call. He thinks RCRA needs to understand the plume and the Drinking Water Program will continue to look at the results in well 8. He added that they will look at this site in the context of their vulnerability assessments that they do frequently and they will take this information into account.